

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

NIKOLAY LEVINSON,

Defendant.

INDICTMENT

23 Cr.

23 CRIM 570

COUNT ONE

(Mailing Threatening Communication)

The Grand Jury charges:

1. On or about June 30, 2022, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication containing a threat to injure the person of another, to wit, LEVINSON mailed from New Jersey to a jewelry store in the Bronx, New York ("Victim-1"), a letter containing the text "NIGGERS, JEWS . . . BAD NEWS!" and a cartoon drawing depicting a black man pointing a handgun in the direction of a white man wearing a yarmulke and holding a piece of paper bearing the words "NOTICE – RENT HIKE – EFFECTIVE IMMEDIATELY."

2. LEVINSON intentionally selected Victim-1's employees as the object of the offense because of Victim-1's employees' actual and perceived religion and ethnicity.

(Title 18, United States Code, Section 876(c).)

COUNT TWO
(Mailing Threatening Communication)

The Grand Jury further charges:

3. On or about July 7, 2022, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication containing a threat to injure the person of another, to wit, LEVINSON mailed from New Jersey to a law firm in New York, New York (“Victim-2”), a letter containing the text “NIGGERS, JEWS . . . BAD NEWS!” and a cartoon drawing depicting a black man pointing a handgun in the direction of a white man wearing a yarmulke and holding a piece of paper bearing the words “NOTICE – RENT HIKE – EFFECTIVE IMMEDIATELY.”

4. LEVINSON intentionally selected Victim-2’s employees as the object of the offense because of Victim-2’s employees’ actual and perceived religion and ethnicity.

(Title 18, United States Code, Section 876(c).)

COUNT THREE
(Mailing Threatening Communication)

The Grand Jury further charges:

5. On or about July 8, 2022, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication containing a threat to injure the person of another, to wit, LEVINSON mailed from New Jersey to an individual in Brooklyn, New York (“Victim-3”), through the Southern District of New York, a

letter containing, among other things, a swastika and an image of Adolph Hitler, inside an envelope bearing the words: “I am coming To Kill you.”

6. LEVINSON intentionally selected Victim-3 as the object of the offense because of Victim-3’s actual and perceived religion and ethnicity.

(Title 18, United States Code, Section 876(c).)

COUNT FOUR
(Mailing Threatening Communication)

The Grand Jury further charges:

7. On or about October 17, 2022, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication containing a threat to injure the person of another, to wit, LEVINSON mailed from New Jersey to Victim-3 in Brooklyn, New York, through the Southern District of New York, a letter bearing the words: “YOU WILL DIE SOON! WE ARE COMING TO KILL YOU! DEATH!”

8. LEVINSON intentionally selected Victim-3 as the object of the offense because of Victim-3’s actual and perceived religion and ethnicity.

(Title 18, United States Code, Section 876(c).)

COUNT FIVE
(Mailing Threatening Communication)

The Grand Jury further charges:

9. On or about October 21, 2022, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused

to be delivered by the Postal Service according to the directions thereon, a communication containing a threat to injury the person of another, to wit, LEVINSON mailed from New Jersey to the principal of a public high school in Brooklyn, New York (“Victim-4”), through the Southern District of New York, a letter bearing the words: “YOU ARE ALL GOING TO DIE SOON. DEADLY SHOOTING IS COMING.”

10. Levinson intentionally selected Victim-4’s employees and students as the object of the offense because of Victim-4’s employees’ and students’ actual and perceived religion and ethnicity.

(Title 18, United States Code, Section 876(c).)

COUNT SIX
(Mailing Threatening Communication)

The Grand Jury further charges:

11. On or about November 6, 2022, in the Southern District of New York and elsewhere, NIKOLAY LEVINSON, the defendant, knowingly and willfully did deposit in an authorized depository for mail matter, to be sent and delivered by the Postal Service, and knowingly caused to be delivered by the Postal Service according to the directions thereon, a communication containing a threat to injure the person of another, to wit, LEVINSON mailed from New Jersey to an individual in Brooklyn, New York (“Victim-5”), through the Southern District of New York, a letter bearing the words: “WE ARE COMING TO KILL YOU! YOU HAVE TO DIE.”

12. LEVINSON intentionally selected Victim-5 as the object of the offense because of Victim-5's actual and perceived religion and ethnicity.

(Title 18, United States Code, Section 876(c).)

ml [signature] 11/1/2023
FOREPERSON

Damian Williams
DAMIAN WILLIAMS